

**From:** [PETERSON Jenn L](#)  
**To:** [Eric Blischke/R10/USEPA/US@EPA](#)  
**Cc:** [Burt Shephard/R10/USEPA/US@EPA](#)  
**Subject:** RE: Fw: Compiled PRG Tables  
**Date:** 02/17/2010 12:23 PM

There are also several important pathways missing (e.g. bird egg - or there would be a dioxin number for higher trophic level birds). Are you accepting comments? If so, when?

On another note, there seems to be this strange idea prevalent in the risk assessment and recent presentations that there is no source of mercury in the ISA, and therefore the subsequent risk is a regional issue. Implications are that PRGs wouldn't be developed for mercury. However, there is one large source of mercury that I know of and that is Willamette Cove - highest detect there was 79 ppm. We also have upland sources of mercury, and widespread elevations in sediment in the area. Is this being tracked in the FS?

Jennifer

-----Original Message-----

From: Shephard.Burt@epamail.epa.gov [mailto:Shephard.Burt@epamail.epa.gov]  
Sent: Wednesday, February 17, 2010 12:12 PM  
To: Blischke.Eric@epamail.epa.gov  
Cc: ANDERSON Jim M; audiehuber@ctuir.com; Benjamin Shorr; Brad Hermanson; Bob Dexter; Humphrey.Chip@epamail.epa.gov; cunninghame@gorge.net; dallen@stratusconsulting.com; Davoli.Dana@epamail.epa.gov; FARRER David.G; erin.madden@gmail.com; frenchrd@cdm.com; GAINER Tom; Genevieve.Angle@noaa.gov; Grepo-Grove.Gina@epamail.epa.gov; jay.field@noaa.gov; jeremy\_buck@fws.gov; Jessica.Winter@noaa.gov; JMalek@parametrix.com; Goulet.Joe@epamail.epa.gov; jpeers@stratusconsulting.com; Smith.Judy@epamail.epa.gov; jweis@hk-law.com; Koch.Kristine@epamail.epa.gov; LavelleJM@cdm.com; Lisa.Bluelake@grandronde.org; Cora.Lori@epamail.epa.gov; Ader.Mark@epamail.epa.gov; Mary.Baker@noaa.gov; MCCLINCY Matt; Michael.Karnosh@grandronde.org; mspence@parametrix.com; nancy.munn@noaa.gov; PETERSON Jenn L; POULSEN Mike; Fuentes.Rene@epamail.epa.gov; Robert.Neely@noaa.gov; rose@yakama.com; ryan@davissudbury.com; Sheldrake.Sean@epamail.epa.gov; sheila@ridolfi.com; Stephen\_Zylstra@fws.gov; TARNOW Karen E; tom@ctsi.nsn.us  
Subject: Re: Fw: Compiled PRG Tables

Eric,

Without even looking at the table I see at least two issues.

LWG was told not to use pooled sediment toxicity endpoints in the BERA. Does that restriction extend to the FS as well?  
Why would one assume surface water concentrations are equal to background concentrations? We know that isn't the case for some chemicals, and without any source control activities, those surface water concentrations will presumably remain above background.

I agree with LWG not deriving PRGs assuming a background concentration of zero. Although perhaps assuming background of zero makes some PRG calculations easier, its not the real world situation.

Best regards,

Burt Shephard  
Risk Evaluation Unit  
Office of Environmental Assessment (OEA-095) U.S. Environmental Protection Agency, Region 10 1200  
6th Avenue Seattle, WA 98101

Telephone: (206) 553-6359  
Fax: (206) 553-0119

e-mail: Shephard.Burt@epa.gov

"If your experiment needs statistics to analyze the results, then you ought to have done a better experiment"

- Ernest Rutherford

From: Eric Blischke/R10/USEPA/US  
To: Burt Shephard/R10/USEPA/US@EPA, Chip Humphrey/R10/USEPA/US@EPA, Dana Davoli/R10/USEPA/US@EPA, GAINER Tom  
<GAINER.Tom@deq.state.or.us>, Gina Grepo-Grove/R10/USEPA/US@EPA, Jennifer L Peterson  
<PETERSON.Jenn@deq.state.or.us>, jeremy\_buck@fws.gov, anderson.jim@deq.state.or.us,  
Joe Goulet/R10/USEPA/US@EPA, Judy Smith/R10/USEPA/US, Kristine Koch/R10/USEPA/US@EPA,  
MCCLINCY Matt  
<MCCLINCY.Matt@deq.state.or.us>, POULSEN Mike <POULSEN.Mike@deq.state.or.us>, Rene Fuentes/R10/USEPA/US@EPA, Robert.Neely@noaa.gov, Sean Sheldrake/R10/USEPA/US@EPA, tom@ctsi.nsn.us, rose@yakama.com, erin.madden@gmail.com, jay.field@noaa.gov, Lori Cora/R10/USEPA/US, Mark Ader/R10/USEPA/US@EPA, audiehuber@ctuir.com, Lisa.Bluelake@grandronde.org, sheila@ridolfi.com, Benjamin Shorr <Benjamin.Shorr@noaa.gov>, LavelleJM@cdm.com, Mary.Baker@noaa.gov, Michael.Karnosh@grandronde.org, David.G.Farrer@state.or.us, dallen@stratusconsulting.com, jpeers@stratusconsulting.com, Bob Dexter <bob@ridolfi.com>, cunninghame@gorge.net, JMalek@parametrix.com, nancy.munn@noaa.gov, jweis@hk-law.com, Brad Hermanson <bhermanson@parametrix.com>, frenchrd@cdm.com, ryan@davissudbury.com, Stephen\_Zylstra@fws.gov, Judy Smith/R10/USEPA/US, Genevieve.Angle@noaa.gov, TARNOW.Karen@deq.state.or.us, Jessica.Winter@noaa.gov, mspence@parametrix.com  
Date: 02/17/2010 11:26 AM

Subject: Fw: Compiled PRG Tables

This came in last week. Some of you already have it.

Eric

----- Forwarded by Eric Blischke/R10/USEPA/US on 02/17/2010 11:26 AM

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From: "Jennifer Woronets" <jworonets@anchorqea.com>  
To: Chip Humphrey/R10/USEPA/US@EPA, Eric Blischke/R10/USEPA/US@EPA  
Cc: <ANDERSON.Jim@deg.state.or.us>, <audiehuber@ctuir.com>, Eric Blischke/R10/USEPA/US@EPA, "Bob Wyatt" <rjw@nwnatural.com>, <cunninghame@gorge.net>, <erin.madden@gmail.com>, Chip Humphrey/R10/USEPA/US@EPA, "JD Williams" <jdw@jdw-law.net>, "Jennifer Peers" <jpeers@stratusconsulting.com>, "Jennifer Woronets" <jworonets@anchorenv.com>, "Julie Weis" <jweis@hk-law.com>, "Keith Pine" <kpine@anchorenv.com>, Kristine Koch/R10/USEPA/US@EPA, <lisa.bluelake@grandronde.org>, <matt@jdw-law.net>, "MCCLINCY Matt" <MCCLINCY.Matt@deg.state.or.us>, "McKenna, Jim" <Jim.McKenna@portofportland.com>, "Michael Karnosh" <michael.karnosh@grandronde.org>, "Rick Applegate" <RICKA@BES.CI.PORTLAND.OR.US>, "Robert Neely" <Robert.Neely@noaa.gov>, "R [REDACTED] com>, <sheila@ridolfi.com>, <Stephen\_Zylstra@fws.gov>, (b) (6) "Bob Wyatt" <rjw@nwnatural.com>, <david.ashton@portofportland.com>, <Frederick.wolf@total.com>, "J Betz" <jbetz@ci.portland.or.us>, "Jennifer Woronets" <jworonets@anchorqea.com>, <Jim.McKenna@portofportland.com>, <karen.traeger@total.com>, <pdost@pearllegalgroup.com>, "Rick Applegate" <RICKA@BES.CI.PORTLAND.OR.US>, "Steve Parkinson" <sparkinson@GroffMurphy.com>, "Carl Stivers" <cstivers@anchorqea.com>, "Keith Pine" <kpine@anchorqea.com>, "Jennifer Woronets" <jworonets@anchorqea.com>  
Date: 02/10/2010 05:33 PM  
Subject: FW: Compiled PRG Tables

Eric, Chip,

Please see below and attached compiled PRG tables.

Please let us know if you have any questions.

Thank you,  
Jen Woronets J  
Anchor QEA, LLC  
jworonets@anchorqea.com  
6650 SW Redwood Lane, Suite 333  
Portland, OR 97224  
503-670-1108 Ext 24  
503-670-1128 Fax

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From: Carl Stivers  
Sent: Wednesday, February 10, 2010 5:10 PM  
To: Jennifer Woronets  
Subject: Compiled PRG Tables

Jen - Please pass on to EPA.

Thanks.

Chip and Eric -

Attached are the compiled PRG tables that we discussed today. This represents a compilation of past information we have provided to you in various deliverables. We intend this as a starting point to assist in the LOE discussions, and to the extent that EPA believes other PRGs are available and can be included, we are open to hearing those ideas in upcoming meetings. The excel workbook contains sheets containing:

1. Human Health Direct Contact PRGs
2. Human Health Fish Consumption PRGs (assuming surface water is equal to background concentrations)
3. Ecological Tissue and Dietary Does PRGs (assuming surface water is equal to background concentrations)
4. Ecological SQGs, EPA July 2009 approach, from Table 4-5 of the benthic reanalysis technical memo. These are pooled endpoint SQGs based on the three endpoint model (not including the Hyalella biomass endpoint).
5. Three worksheets including RI background numbers calculated on a dry weight, OC-equivalent dry weight, and OC-normalized bases,

respectively.

These do not include bioaccumulation based PRGs that assume water concentration is equal to zero, because it seems like so far no one has been using those. These also do not include other possible benthic SQGs in the technical memo, and it is my understanding that some other possible variations are currently being calculated, but are not necessarily all available at this time.

Thanks much.

Carl

Carl Stivers  
ANCHOR QEA, LLC  
cstivers@anchorqea.com  
23 S. Wenatchee Ave, Suite 120  
Wenatchee, WA 98801  
Phone: 509.888.2070  
Fax: 509.888.2211

ANCHOR QEA, LLC  
www.anchorqea.com  
Please consider the environment before printing this email.  
(See attached file: Compiled PRG\_Tables\_Combined\_10 Feb 09.xls)